

From: gabriela roman <roma1531@gmail.com>

Sent: Friday, June 13, 2025 9:46 PM

To: Joe Grant <jgrant@loriumlaw.com>

Cc: Justin Kaplan <justin.kaplan@nelsonmullins.com>; Elaine Kussurelis <elaine.kussurelis@nelsonmullins.com>; Elyse Cohen <elyse.cohen@nelsonmullins.com>; christopheremanuelszabo <christopheremanuelszabo@gmail.com>; Khaled Elsis <khaled_elsisi19@hotmail.com>; Linwood Walker <walker3402@yahoo.com>; njay123@gmail.com <njay123@gmail.com>; ryeng2012@gmail.com <ryeng2012@gmail.com>; luispinos64@yahoo.com <luispinos64@yahoo.com>; ahmed.m.sharafeldin@gmail.com <ahmed.m.sharafeldin@gmail.com>; rico Marquez <marquezsales16@gmail.com>; Barry Rosner <barry.rosner@route22toyota.com>; Ahmed Khedr <ahmedkhedr5161@gmail.com>; Asher Lewis <inevitablegains@gmail.com>; Stuart Springfield <stuartspringfield@gmail.com>; juan nicasio <nicasioonline@gmail.com>; aliqwanpack@gmail.com <aliqwanpack@gmail.com>; Christine Masters <chrissy.masters@icloud.com>

Subject: Re: Depositions

Mr. Grant,

Being pro se does not mean we are seeking special treatment—it means we are entitled to **equal treatment** under the law, including the right to object to improper procedures and orders that violate the Federal Rules of Civil Procedure and constitutional safeguards.

We stand by the objections and relief sought in Dkt. 136, which is now pending before Judge Farbiarz. Until the District Judge rules, we will not engage in discovery under a disputed and improperly imposed schedule. If you believe court intervention is necessary, feel free to seek it. We are fully prepared to respond.

Respectfully,
Gabriela Roman
Pro Se Plaintiff

On Fri, Jun 13, 2025 at 9:43 PM Joe Grant <jgrant@loriumlaw.com> wrote:

You are pro se. I understand. It does not mean that you can ignore Court orders or you are given some type of special treatment. We are asking you for depositions, so please provide same. Otherwise, we will seek court intervention on this issue.

On Jun 13, 2025, at 9:41 PM, gabriela roman <roma1531@gmail.com> wrote:

Mr. Grant,

Respectfully, we are well aware that you opposed jurisdiction in both the original and amended complaints. However, the procedural record speaks for itself: the Magistrate denied the defendants' motion to dismiss, ordered an answer, and then reversed course—allowing defendants not to respond to the complaint unless and until full jurisdiction is proven through discovery.

That departure from the Federal Rules of Civil Procedure is at the heart of our objection.

We maintain that once the motion to dismiss was denied, your client was obligated to answer the complaint under Rule 12(a)(4). Further, by not responding, your client has now risked admitting well-pleaded allegations under Rule 8(b)(6). The attempt to avoid answering while simultaneously pressuring Plaintiffs into excessive discovery—on an outdated complaint—reflects a deeply flawed process.

More concerning is that the Magistrate Judge has repeatedly ruled on matters not referred to him and has terminated filings addressed to the District Judge, which exceeds the scope of his delegated authority and undermines the procedural integrity of this case. We stand by our filing at Dkt. 136 and await the District Judge's ruling.

There is no need for further email dialogue. We will address all future issues through the appropriate legal channels.

Sincerely,
Gabriela Roman
Pro Se Plaintiff

On Fri, Jun 13, 2025 at 9:20 PM Joe Grant <jgrant@loriumlaw.com> wrote:
Ms. Roman,

I am going to respond to you on one issue. It seems to be what is holding up everything and I understand you still might disagree. The amended complaint, as filed, still does not mean that the plaintiffs have alleged personal jurisdiction over any of the defendants. I know you said we did not oppose certain allegations, but we reserve the right to still challenge personal jurisdiction. Judge Hammer agreed as such. Simply because you put something in writing in an amended complaint does not make it true. We have the right to challenge the assertion of jurisdiction in NJ.

There is no need to respond to me. I am simply trying to point out that procedurally, we have never waived our argument that personal jurisdiction does not exist in NJ. My client intends to object to jurisdiction in NJ.

<Outlook-mLorium la.png>

Joe M. Grant, Esq.

Practice Leader – Bankruptcy and Commercial Litigation

Attorney Bio

Phone: (561) 361-1000

Web: loriumlaw.com

Email: jgrant@loriumlaw.com

197 S. Federal Highway, Suite 200

Boca Raton, FL 33432

<Outlook-gecl4bho.png>

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intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you receive this communication in error, please notify us immediately by telephone call to (561) 361-1000 and delete the message. Thank you.

From: gabriela roman <roma1531@gmail.com>

Sent: Friday, June 13, 2025 9:05 PM

To: Justin Kaplan <justin.kaplan@nelsonmullins.com>

Cc: Joe Grant <jgrant@loriumlaw.com>; Elaine Kussurelis <elaine.kussurelis@nelsonmullins.com>; Elyse Cohen <elyse.cohen@nelsonmullins.com>; christopheremanzabozabo

<christopheremanzabozabo@gmail.com>; Khaled Elsisy <khaled_elsisy19@hotmail.com>; Linwood

Walker <lwalker3402@yahoo.com>; njay123@gmail.com <njay123@gmail.com>;

ryeng2012@gmail.com <ryeng2012@gmail.com>; luispinos64@yahoo.com <luispinos64@yahoo.com>;

ahmed.m.sharafeldin@gmail.com <ahmed.m.sharafeldin@gmail.com>; rico Marquez

<marquezsales16@gmail.com>; Barry Rosner <barry.rosner@route22toyota.com>; Ahmed Khedr

<ahmedkhedr5161@gmail.com>; Asher Lewis <inevitablegains@gmail.com>; Stuart Springfield

<stuartspringfield@gmail.com>; juan nicasio <nicasioonline@gmail.com>; aliqwanpack@gmail.com

<aliqwanpack@gmail.com>; Christine Masters <chrissey.masters@icloud.com>

Subject: Re: Depositions

Mr. Kaplan,

We appreciate your stated intention to minimize disruption; however, we must reiterate that Dkt. 136 is now before Judge Farbiarz, and the discovery schedule, including depositions, is no longer under the magistrate's authority. As such, we will await the District Court's ruling on our pending motion before taking any steps that could moot or undermine the relief sought.

Your assertion that "Plaintiffs remain bound" while the motion is pending disregards both the jurisdictional shift and the fact that Rule 26(c) authorizes a party to seek a stay to prevent "annoyance, embarrassment, oppression, or undue burden or expense." As made clear in *United States v. Columbia Broadcasting System, Inc.*, 666 F.2d 364, 368–69 (9th Cir. 1982), once a motion to stay is filed and under consideration, good faith requires that discovery not proceed until the motion is resolved, especially when it involves significant constitutional and procedural objections, as ours does. We respectfully decline to coordinate deposition dates at this time. Any attempt to unilaterally set dates before the District Judge has ruled would constitute premature and coercive conduct, and will be addressed accordingly in court if necessary.

We trust the Court will appreciate our continued efforts to avoid unnecessary disputes while preserving judicial efficiency.

Respectfully,
The Plaintiffs

On Fri, Jun 13, 2025 at 11:05 AM Justin Kaplan <justin.kaplan@nelsonmullins.com> wrote:

Respectfully, the Court made it clear yesterday that until and unless an existing Order is vacated or modified, Plaintiffs remain bound.

We must complete depositions by September 30th; and we cannot reasonably commence taking them until Plaintiffs have responded to the written discovery requests and produced responsive documents. That deadline is now not until July 30th. There is already a limited number of days during the foregoing time period that we are available to take the permitted depositions and we cannot keep those dates open indefinitely while we wait for the District Court Judge to rule on Plaintiffs' objections.

I implore all Plaintiffs to coordinate date with us at this time. Should the District Court overrule any currently-pending Order in a manner that relieves the Plaintiffs from appearing, they will obviously be cancelled.

To that end, I renew my below request. If you refuse to coordinate, we will have no choice but to unilaterally set each Plaintiff's deposition at a date and time of our choosing. We would rather coordinate dates with each Plaintiff to minimize disruption to everyone's schedules as much as is practicable.

Regards,

Justin B. Kaplan



JUSTIN KAPLAN PARTNER

justin.kaplan@nelsonmullins.com

2 SOUTH BISCAYNE BLVD. | 21ST FLOOR

MIAMI, FL 33131

T 305.373.9436 F 305.373.9443

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From: gabriela roman <roma1531@gmail.com>

Sent: Friday, June 13, 2025 10:55 AM

To: Joe Grant <jgrant@loriumlaw.com>

Cc: Justin Kaplan <justin.kaplan@nelsonmullins.com>; Elaine Kussurelis

<elaine.kussurelis@nelsonmullins.com>; Elyse Cohen <elyse.cohen@nelsonmullins.com>;

christopheremanuelszabo <christopheremanuelszabo@gmail.com>; Khaled Elisi

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<marquezsales16@gmail.com>; Barry Rosner <barry.rosner@route22toyota.com>; Ahmed Khedr

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<stuartspringfield@gmail.com>; juan nicasio <nicasioonline@gmail.com>; aliqwanpack@gmail.com;

Christine Masters <chrissy.masters@icloud.com>

Subject: Re: Depositions

Dear Counsel,

Our last filing Dkt 136 is now referred to Judge Farbiarz. We will first wait for his ruling. Thank you for understanding.

Regards,
The Plaintiffs

On Fri, Jun 13, 2025, 10:45 AM Joe Grant <jgrant@loriumlaw.com> wrote:
We will be noticing depositions at the same time so I may need an additional hour per deposition. I would like to be as efficient as possible with all of you and your time so that I am not separately scheduling depositions.

On Jun 13, 2025, at 9:55 AM, Justin Kaplan <justin.kaplan@nelsonmullins.com> wrote:

All,

Good morning. Attached please find the Court's Third Amended Jurisdictional Scheduling Order.

We renew our request to coordinate each of your depositions, which will be held in Camden, New Jersey. To that end, please advise which of the below dates you are **NOT** available. We anticipate each deposition being no longer than two hours; so we will schedule multiple depositions for the same day.

August 18, 19, 20, 21
September 2, 3, 4, 8, 9, 10, 23, 24, 25, 26

Thank you.



JUSTIN KAPLAN **PARTNER**
justin.kaplan@nelsonmullins.com

[2 SOUTH BISCAIYNE BLVD. | 21ST FLOOR](#)
[MIAMI, FL 33131](#)

T 305.373.9436 F 305.373.9443

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From: gabriela roman <roma1531@gmail.com>

Sent: Thursday, April 24, 2025 8:01 AM

To: Justin Kaplan <justin.kaplan@nelsonmullins.com>

Cc: Elaine Kussurelis <elaine.kussurelis@nelsonmullins.com>; Elyse Cohen <elyse.cohen@nelsonmullins.com>; Joe Grant <jgrant@loriumlaw.com>; christophermanuelzabo <christophermanuelzabo@gmail.com>; Khaled Elsis <khaled_elsisi19@hotmail.com>; Linwood

Walker <walker3402@yahoo.com>; njay123@gmail.com; ryeng2012@gmail.com;
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<stuartspringfield@gmail.com>; juan nicasio <nicasioonline@gmail.com>; aliqwanpack@gmail.com;
Christine Masters <chrissy.masters@icloud.com>

Subject: Re: Depositions

Dear Mr. Kaplan,

Thank you for your message. We respectfully disagree with your characterization of the current procedural posture and the scope of Judge Farbiarz's authority.

First, D.E. 112 raises dispositive issues involving the invalidity of Limited Power of Attorney (LPOA) agreements executed through fraudulent documents. Contrary to your statement, this motion is not disconnected from jurisdiction. The Defendants have invoked arbitration on two separate occasions — first in their January 10, 2024 Motion to Dismiss, and again in their April 2, 2024 brief — both times relying on the very LPOAs that Plaintiffs now seek to void. The enforceability of those agreements is therefore squarely intertwined with jurisdictional issues and must be addressed before any discovery proceeds. It is also for this reason that the District Judge, not the Magistrate, must rule on D.E. 112, as dispositive motions cannot be finally adjudicated by a magistrate absent party consent or formal referral.

Second, regarding D.E. 113 and 114, we maintain that Judge Farbiarz's April 23, 2025 Order did not deny the underlying relief sought in D.E. 103 or D.E. 112, but rather declined to re-address arguments he perceived as duplicative or procedurally unsupported. Importantly, Judge Farbiarz has not vacated his intention to rule on D.E. 110 or 112, and Plaintiffs intend to await his decision, as previously scheduled for May 19, 2025.

Finally, your request that we reconsider our position is premature. Plaintiffs have made clear, through multiple filings, that the jurisdictional discovery plan:

- Was created without their participation,
- Relied on a complaint that is being amended,
- And is being challenged through formal, pending motions that raise constitutional and procedural objections.

Until those motions are ruled upon by the appropriate judicial officer, we will continue to preserve all of our rights under the Federal Rules and applicable case law.

Sincerely,
The Plaintiffs

On Thu, Apr 24, 2025 at 6:36 AM Justin Kaplan <justin.kaplan@nelsonmullins.com> wrote:
Respectfully,

Docket Entry 110 is an Order denying Plaintiffs' Motion in Opposition to Defendants' Proposed Order and in further support of their Omnibus Motion. The only pending motion is Docket Entry 112, which is merely a Motion for Declaratory Judgment that has no bearing on jurisdictional discovery. To wit, the Court cannot grant that motion (were it even procedurally proper) until and unless it accepts jurisdiction.

In addition, the April 23rd Order expressly denies Plaintiffs' Objections and Opposition to the Magistrate Judge's April 11, 2025 Order and Reassertion to Vacate Discovery Plan, Stay Proceedings, Introduce Amended Complaint, and Void Fraudulent LPOA's [D.E. 113]. Given that Plaintiffs sought in that motion to vacate the discovery plan and stay the proceedings and that such requests were denied, we would respectfully request that Plaintiffs reconsider the below. Should they not do so, we will have no choice but to move to compel attendance at deposition and for sanctions. We would, of course, prefer not to do so and move on with the Court-Ordered discovery.

Best,

Justin Kaplan



JUSTIN KAPLAN PARTNER

justin.kaplan@nelsonmullins.com

[2 SOUTH BISCAYNE BLVD. | 21ST FLOOR](#)

[MIAMI, FL 33131](#)

T 305.373.9436 F 305.373.9443

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From: gabriela roman <roma1531@gmail.com>

Sent: Wednesday, April 23, 2025 7:06 PM

To: Justin Kaplan <justin.kaplan@nelsonmullins.com>

Cc: Elaine Kussurelis <elaine.kussurelis@nelsonmullins.com>; Elyse Cohen <elyse.cohen@nelsonmullins.com>; Joe Grant <jgrant@loriumlaw.com>; christophermanuelzabo <christophermanuelzabo@gmail.com>; Khaled Elsis <khaled_elsisi19@hotmail.com>; Linwood Walker <lwalker3402@yahoo.com>; njay123@gmail.com; ryeng2012@gmail.com; luispinos64@yahoo.com; ahmed.m.sharafeldin@gmail.com; rico Marquez <marquezsales16@gmail.com>; Barry Rosner <barry.rosner@route22toyota.com>; Ahmed Khedr <ahmedkhedr5161@gmail.com>; Asher Lewis <inevitablegains@gmail.com>; Stuart Springfield <stuartspringfield@gmail.com>; juan nicasio <nicasioonline@gmail.com>; aliqwanpack@gmail.com; Christine Masters <chrissey.masters@icloud.com>

Subject: Re: Depositions

Dear Mr. Kaplan,

I believe you may have overlooked an important detail. Judge Farbiarz is still ruling on D.E. 110 and 112, which remain pending. The motions dismissed in his recent order — D.E. 113 and 114 — appear to have been treated as duplicative or insufficiently supported in light of D.E. 110.

We do not interpret Judge Farbiarz's order as a definitive denial of the relief sought, but rather as a finding that D.E. 113 and 114 did not meet the required threshold, possibly due to their overlap with the issues already raised in D.E. 110.

Kind regards,
The Plaintiffs

On Wed, Apr 23, 2025 at 8:07 AM Justin Kaplan <justin.kaplan@nelsonmullins.com> wrote:

All,

Good morning.

Given the Court's denial of all pending motions (D.E. 115), we renew our request below.

Best,

Justin Kaplan



JUSTIN KAPLAN PARTNER

justin.kaplan@nelsonmullins.com

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[MIAMI, FL 33131](#)

T 305.373.9436 F 305.373.9443

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From: gabriela roman <roma1531@gmail.com>

Sent: Monday, April 21, 2025 1:54 PM

To: Justin Kaplan <justin.kaplan@nelsonmullins.com>

Cc: Elaine Kussurelis <elaine.kussurelis@nelsonmullins.com>; Elyse Cohen <elyse.cohen@nelsonmullins.com>; Joe Grant <jgrant@loriumlaw.com>; christopheremanuelszabo <christopheremanuelszabo@gmail.com>; Khaled Elsis <khaled_elsisi19@hotmail.com>; Linwood Walker <lwalker3402@yahoo.com>; njay123@gmail.com; ryeng2012@gmail.com; luispinos64@yahoo.com; ahmed.m.sharafeldin@gmail.com; rico Marquez <marquezsales16@gmail.com>; Barry Rosner <barry.rosner@route22toyota.com>; Ahmed Khedr <ahmedkhedr5161@gmail.com>; Asher Lewis <inevitablegains@gmail.com>; Stuart Springfield <stuartspringfield@gmail.com>; juan nicasio <nicasioonline@gmail.com>; aliqwanpack@gmail.com; Christine Masters <chrissy.masters@icloud.com>

Subject: Re: Depositions

Dear Mr. Kaplan,

In view of the new court filings and pending motions, including Plaintiffs' Motion to Vacate the Magistrate's Order and Motion for Declaratory Judgment, both of which are now set to be decided by Judge Farbiarz on May 19, 2025, we respectfully decline to coordinate depositions at this time. We believe it is premature to proceed with jurisdictional discovery while motions are pending that may significantly affect the course of proceedings. We will await the Court's rulings before addressing any scheduling matters. Sincerely,
The Plaintiffs

On Fri, Apr 18, 2025 at 9:02 AM Justin Kaplan <justin.kaplan@nelsonmullins.com> wrote:
All,

Good morning. Having received no response from anyone, I am following up on the below.

Please be advised that if you fail to coordinate your availability with us, we will have no choice but to unilaterally set your depositions; and, to the extent that you do not appear at the time and place we determine, we will ask the Court to impose sanctions.

We would, of course, prefer to work together with each of you to accommodate your schedules to the extent possible.

I look forward to hearing back from all of you.

Best,

Justin Kaplan



JUSTIN KAPLAN **PARTNER**
justin.kaplan@nelsonmullins.com

[2 SOUTH BISCAYNE BLVD. | 21ST FLOOR](#)
[MIAMI, FL 33131](#)

T 305.373.9436 F 305.373.9443

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From: Justin Kaplan <justin.kaplan@nelsonmullins.com>

Sent: Wednesday, April 16, 2025 6:44 AM

To: gabriela roman <roma1531@gmail.com>; Elaine Kussurelis <elaine.kussurelis@nelsonmullins.com>; Elyse Cohen <elyse.cohen@nelsonmullins.com>; Joe Grant <jgrant@loriumlaw.com>

Cc: christophermanuelzabo <christophermanuelzabo@gmail.com>; Khaled Elsis <khaled_elsisi19@hotmail.com>; Linwood Walker <lwalker3402@yahoo.com>; njay123@gmail.com; ryeng2012@gmail.com; luispinos64@yahoo.com; ahmed.m.sharafeldin@gmail.com; rico Marquez <marquezsales16@gmail.com>; Barry Rosner <barry.rosner@route22toyota.com>; Ahmed Khedr

<ahmedkhedr5161@gmail.com>; Asher Lewis <inevitablegains@gmail.com>; Stuart Springfield <stuartspringfield@gmail.com>; juan nicasio <nicasioonline@gmail.com>; aliqwanpack@gmail.com;
Christine Masters <chrissy.masters@icloud.com>

Subject: RE: Depositions

All,

Good morning. Given the Court's recent rulings, we renew our request to coordinate each Plaintiff's depositions for jurisdictional purposes to occur in Camden, New Jersey. Please accordingly advise us which of the below dates you are **NOT** available.

May 20, 21, 22, 26, 27

June 2, 3, 4, 5, 9, 11, 12, 13, 16, 17, 18, 19, 20, 23, 24, 25, 26, 27, 30

July 7, 8, 9, 10, 11

August 18, 19, 20, 21, 22, 25

Regards,

Justin Kaplan



JUSTIN KAPLAN PARTNER

justin.kaplan@nelsonmullins.com

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[MIAMI, FL 33131](#)

T 305.373.9436 F 305.373.9443

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From: gabriela roman <roma1531@gmail.com>

Sent: Thursday, March 13, 2025 7:55 AM

To: Justin Kaplan <justin.kaplan@nelsonmullins.com>

Cc: christophermanuelzabo <christophermanuelzabo@gmail.com>; Khaled Elsi <khaled_elsisi19@hotmail.com>; Linwood Walker <lwalker3402@yahoo.com>; njay123@gmail.com; ryeng2012@gmail.com; luispinos64@yahoo.com; ahmed.m.sharafeldin@gmail.com; rico Marquez <marquezsales16@gmail.com>; Barry Rosner <barry.rosner@route22toyota.com>; Ahmed Khedr <ahmedkhedr5161@gmail.com>; Asher Lewis <inevitablegains@gmail.com>; Stuart Springfield <stuartspringfield@gmail.com>; juan nicasio <nicasioonline@gmail.com>; aliqwanpack@gmail.com;
Christine Masters <chrissy.masters@icloud.com>

Subject: Re: Depositions

Mr. Kaplan,

We acknowledge your position. However, we do not agree that the magistrate judge's order is beyond challenge or that scheduling depositions at this stage is appropriate given the ongoing developments.

We will advise at the appropriate time.
Regards,
Gabriela

On Thu, Mar 13, 2025 at 7:52 AM Justin Kaplan <justin.kaplan@nelsonmullins.com> wrote:
I understand that plaintiffs may move for reconsideration. There is no right to an immediate appeal. Until and unless a motion to reconsider is actually granted, the order sought to be reconsidered remains in full force and effect.

We are trying in earnest to work together with the Plaintiffs to schedule depositions at a mutually agreeable day and time. I would ask that all Plaintiffs engage and participate in this endeavor. In the event that the Court vacates or amends its prior Orders in a manner that would prevent the depositions from going forward or as scheduled, we will change course.

I accordingly renew our request. To the extent that any other plaintiff refuses to engage, we will unilaterally set depositions on a day and time that has not been coordinated as any failure to coordinate mutually-agreeable dates and times would be no fault of our clients.

Please take these series of communications to be our good-faith attempt to confer in accordance with United States District of New Jersey Local Rules 16.1.



JUSTIN KAPLAN **PARTNER**

justin.kaplan@nelsonmullins.com

[2 SOUTH BISCAYNE BLVD. | 21ST FLOOR](#)
[MIAMI, FL 33131](#)

T 305.373.9436 F 305.373.9443

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From: gabriela roman <roma1531@gmail.com>
Sent: Thursday, March 13, 2025 7:42 AM
To: Justin Kaplan <justin.kaplan@nelsonmullins.com>
Cc: christopheremanuelszabo <christopheremanuelszabo@gmail.com>; Khaled Elsis <khaled_elsisi19@hotmail.com>; Linwood Walker <lwalker3402@yahoo.com>; njay123@gmail.com; ryeng2012@gmail.com; luispinos64@yahoo.com; ahmed.m.sharafeldin@gmail.com; rico Marquez <marquezsales16@gmail.com>; Barry Rosner <barry.rosner@route22toyota.com>; Ahmed Khedr <ahmedkhedr5161@gmail.com>; Asher Lewis <inevitablegains@gmail.com>; Stuart Springfield <stuartspringfield@gmail.com>; juan nicasio <nicasioonline@gmail.com>; aliqwanpack@gmail.com; Christine Masters <chrissy.masters@icloud.com>
Subject: Re: Depositions

Mr. Kaplan,
We acknowledge your request. However, as you are aware, judicial orders can be challenged, and this matter is still developing. We will advise on availability at the appropriate time.

Regards,
Gabriela

On Thu, Mar 13, 2025 at 7:33 AM Justin Kaplan <justin.kaplan@nelsonmullins.com> wrote:
It happens.

I look forward to receiving each Plaintiff's response to the below as soon as possible given that lawyers' schedules tend to rapidly change, so we cannot leave those dates open for an extended period of time.

Regards,

Justin Kaplan



JUSTIN KAPLAN PARTNER

justin.kaplan@nelsonmullins.com

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[MIAMI, FL 33131](#)

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From: gabriela roman <roma1531@gmail.com>

Sent: Thursday, March 13, 2025 7:25 AM

To: Justin Kaplan <justin.kaplan@nelsonmullins.com>

Cc: christophermanuelzabo <christophermanuelzabo@gmail.com>; Khaled Elsis <khaled_elsisi19@hotmail.com>; Linwood Walker <lwalker3402@yahoo.com>; njay123@gmail.com; ryeng2012@gmail.com; luispinos64@yahoo.com; ahmed.m.sharafeldin@gmail.com; rico Marquez <marquezsales16@gmail.com>; Barry Rosner <barry.rosner@route22toyota.com>; Ahmed Khedr <ahmedkhedr5161@gmail.com>; Asher Lewis <inevitablegains@gmail.com>; Stuart Springfield <stuartspringfield@gmail.com>; juan nicasio <nicasioonline@gmail.com>; aliqwanpack@gmail.com; Christine Masters <chrissy.masters@icloud.com>

Subject: Re: Depositions

Mr. Kaplan,

Not intentionally, just poor habits. Thank you.

Gabriela

On Thu, Mar 13, 2025, 5:06 AM Justin Kaplan <justin.kaplan@nelsonmullins.com> wrote:
Ms. Roman,

Good morning.

Thank you for acknowledging receipt. In the future, it is imperative that you “reply all.” Failure to do so makes communicating with plaintiffs cumbersome. In addition, it prevents all parties and counsel from being involved in communications pertinent to the case.

Thank you.



JUSTIN KAPLAN PARTNER

justin.kaplan@nelsonmullins.com

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[MIAMI, FL 33131](#)

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From: gabriela roman <roma1531@gmail.com>

Sent: Wednesday, March 12, 2025 10:02 PM

To: Justin Kaplan <justin.kaplan@nelsonmullins.com>

Subject: Re: Depositions

Good Evening,

We acknowledge receipt of your request.

The Plaintiffs

On Wed, Mar 12, 2025 at 7:15 PM Justin Kaplan <justin.kaplan@nelsonmullins.com> wrote:

All,

Good evening. Given the Court's denial of Plaintiffs' Motion to Vacate and its granting of our clients' Motion for Limited Reconsideration, we renew our request to coordinate each Plaintiff's depositions for jurisdictional purposes in Camden, New Jersey. Please accordingly advise us which of the below dates you are **NOT** available.

May 12, 13, 14, 15, 16, 27, 28, 29, 30

June 2, 3, 4, 5, 6, 12, 13, 16, 17, 18, 19, 20, 23, 24, 25, 26, 27

Regards,

Justin Kaplan



JUSTIN KAPLAN **PARTNER**
justin.kaplan@nelsonmullins.com

2 SOUTH BISCAYNE BLVD. | 21ST FLOOR
MIAMI, FL

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